

BCG

SVMG Comments on CEC Distributed Generation Strategic Plan

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SVMG Endorses DG Strategic Plan For Adoption by Energy Commission

- Thanks to Commission and Staff for foresight and perseverance around DG--Important option
- DG Plan is thorough and complete
- Comments on outline dealt with even-handedly
- Strategy options and goals consistent with needs of SVMG member companies
- If successfully enacted, DG Plan will go a long way to enabling widespread adoption of DG

Implementation Recommendations

- Continue to resolve Rule 21 issues
- Coordinate closely with CPUC
- Concentrate on good policy and unintended consequences of actions
- Calculate economic impact of policy
- Consider end-use customer's needs first
- Complement 'DG State Agency Coordination Group' with consumer groups

Why Adoption of Distributed Generation Will Fail In California

- It ain't easy
- Policies do not consider customer's needs first
- Utilities control the interconnection
- It's a tariff game
- Nothing in it for the utilities
- State mandates create stranded costs
- C&I customers have an easier option
- It won't fail for technological reasons